



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

Mr. Brent Zern, Assistant Director – Regulatory Compliance Division
DeKalb County Department of Watershed Management
4572 Memorial Drive
Decatur, Georgia 30032

FEB 11 2020

RE: Industrial Pretreatment Program
Approved Modification of Local Limits
NPDES Permit Nos. GA0026816 &
GA0024147
DeKalb County, Ocmulgee River Basin

Dear Mr. Zern:

The Environmental Protection Division (EPD) has made a determination to move forward in the approval of the modification to the local limits.

Enclosed is a public notice to be published for one day in the largest daily newspaper in the area. This notice does not require a public comment period. The cost of publishing the public notice is the responsibility of the Authority. Please provide this office with a copy of the published notice within 10 days of the publication date.

If you have any questions or comments, please contact Ian McDowell at (404) 232-1567 or ian.mcdowell@dnr.ga.gov.

Sincerely,

Whitney Fenwick, Acting Manager
Industrial Permitting Unit

WF/IM

cc: EPD Watershed Compliance Program – Ashwini Tambe (ashwini.tambe@dnr.ga.gov)



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

PUBLIC NOTICE

Local Pretreatment Program Approval

In accordance with Chapter 391-3-6.09, Rules and Regulations for Water Quality Control, notice is hereby given of approval by the Georgia Environmental Protection Division of changes to a local pretreatment program for DeKalb County covering the Polebridge Creek Advanced Wastewater Treatment Facility (GA0026816) and the Snapfinger Creek Advanced Wastewater Treatment Facility (GA0024147). The pretreatment program provides for the administration and enforcement of pretreatment standards for industrial users of the publicly owned treatment works.



Department of Watershed Management

Scott A. Towler, P.E.
Director

Chief Executive Officer

Michael Thurmond Board of
Commissioners

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Nancy Jester

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Jeff Rader

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District 6
Kathie Gannon

District 7
Gregory Adams Sr.

June 29, 2017

Via Email and Certified Mail/Return Receipt Requested
No. 7016 1370 0001 1537 2644

Ms. Sarita Banjade
Georgia Environmental Protection Division
Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334

Re.: Local Limits Evaluation
Pole Bridge AWTF, Permit No. GA0026816
Snapfinger AWTF, Permit No. GA0024147

Dear Ms. Banjade,

The DeKalb County Department of Watershed Management (DWM) is submitting the attached technical evaluation of the need to revise the local limits per Part III.A.c of the referenced permits. DWM will initiate revision of the adopted local limits based on the technical analysis after 60 days if no comments are received. The draft ordinance revision will be submitted to EPD prior to initiating the legal process for modification of an ordinance.

If you have questions or comments regarding this matter, please do not hesitate to contact me at at siglenn@dekalbcountyga.gov or 770-621-7252.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sandra L. Glenn'.

Sandra L. Glenn, P.E.
Assistant Director
Department of Watershed Management

Enclosures

E-Cc: Scott A. Towler, P.E., Director
Marzieh Shahbaz, GA EPD, Municipal Compliance Unit
Jill Causse, GA EPD, Industrial Compliance Unit
Sarita Banjade, GA EPD, Municipal Compliance Unit
Patricia Moore, Document Control Coordinator
Margaret Tanner, P.E., Deputy Director
Reginald Wells, Deputy Director

Summary of Local Limits for Industrial Users Discharging to Snapping Shoals WWTP
Local Limits Evaluation, DeKalb County DWM

Pollutant	Current (2012) Local Limits (mg/L)		Proposed Local Limits (mg/L)		Change in Local Limits
	Local Limits (mg/L)	Technical Basis for Limits	Local Limits (mg/L)	Technical Basis for Limits	
Conventional Pollutants					
Ammonia			205	NPDES Permit Limits	New Limit
Biochemical Oxygen Demand (BOD)			1,565	NPDES Permit Limits	New Limit
Phosphorus, Total (as P)			44.5	NPDES Permit Limits	New Limit
Suspended Solids, Total (TSS)			7,978	Design Criteria	New Limit
Inorganic Pollutants					
Antimony			2.41	Chronic State WQS	New Limit
Arsenic	0.12	Sludge Disposal	0.035	Sludge Disposal	Decrease Limit
Cadmium	0.005	Background domestic/commercial	0.005	Domestic/Commercial Background Level	No Change
Chromium III			0.75	Chronic State WQS	New Limit
Chromium VI			0.16	Chronic State WQS	New Limit
Chromium, Total	2.25	City of Atlanta	0.16	Chronic State WQS	Decrease Limit
Copper	2.61	City of Atlanta	0.017	Chronic State WQS	Decrease Limit
Cyanide	0.08	Background domestic/commercial	0.082	Domestic/Commercial Background Level	No Change
Lead	0.116	City of Atlanta	0.081	Chronic State WQS	Decrease Limit
Mercury	0.002	Background domestic/commercial	0.002	Domestic/Commercial Background Level	No Change
Molybdenum	1.67	Sludge Disposal	0.34	Sludge Disposal	Decrease Limit
Nickel	1.79	City of Atlanta	0.11	Chronic State WQS	Decrease Limit
Selenium	0.48	Sludge Disposal	0.025	Chronic State WQS	Decrease Limit
Silver	1.73	City of Atlanta	0.005	Domestic/Commercial Background Level	Decrease Limit
Zinc	2.45	Treatment Inhibition	0.094	Activated Sludge Treatment Inhibition	Decrease Limit
Organic Pollutants					
Benzene					New Limit
BHC-Alpha, n-					New Limit
Bis(2-ethylhexyl)Phthalate					New Limit
Chloroform					New Limit
Dichlorobenzene, 1,4-					New Limit
Dichloroethane, 1,2-					New Limit
Diethyl phthalate					New Limit
Dimethylphenol, 2,4-					New Limit
Endosulfan, alpha-					New Limit
Ethylbenzene					New Limit
Lindane					New Limit
Methylene chloride					New Limit
Naphthalene					New Limit
PCBs			0.0000028	Chronic State WQS	New Limit
Tetrachloroethylene					New Limit
Toluene					New Limit
Trichloroethylene					New Limit
Other Pollutants					
Oil and Grease	100	Sewer Protection	100	Sewer Protection	No Change

**Industrial Pretreatment Local Limits Evaluation
DeKalb, DeKalb County**

June 2017

Prepared for



DeKalb County
G E O R G I A

**DeKalb County Department of Watershed Management
Stone Mountain, Georgia**



990 Hammond Drive, Suite 400
Atlanta, Georgia 30328

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List of Abbreviations^{(b)(1)}

AIL	Allowable Industrial Loading
AHL	Allowable Headworks Loading
AWTF	Advanced Wastewater Treatment Facility
BC	Brown and Caldwell
BOD	Biochemical Oxygen Demand
CaCO₃	Calcium Carbonate
CF	Conversion Factor
COD	Chemical Oxygen Demand
DO	Dissolved Oxygen
DWM	Department of Watershed Management^{(b)(2)}
EPA	United States Environmental Protection Agency
EPD	Environmental Protection Division
FOG	Fats, Oils, and Greases
H₂S	Hydrogen Sulfide Gas
LAS	Land Application System
lbs/day	Pounds per Day
LLE	Local Limits Evaluation
MAIL	Maximum Allowable Industrial Loading
MAHL	Maximum Allowable Headworks Loading
mgd	Million Gallons per Day
mg/L	Milligrams per Liter
NPDES	National Pollutant Discharge Elimination System
PCB	Polychlorinated Biphenyls
POC	Pollutant of Concern
POTW	Publicly Owned Treatment Works
SMR	Self-Monitoring Report
TKN	Total Kjeldahl Nitrogen
TSS	Total Suspended Solids
USGS	United States Geological Survey
WQS	Water Quality Standards

List of Variables

1Q10	The lowest average flow for a 1-day period that is expected to occur once every 10 years	LINF	Current influent loading (average or daily maximum), lb/day
7Q10	The lowest average flow for a 7-day period that is expected to occur once every 10 years	LUNC	Loadings from uncontrolled sources, lb/day
AHL _{DESIGN}	AHL based on AWWTF design criteria, lb/day	MAHL	Maximum allowable headworks loading, lb/day
AHL _{NPDES}	AHL based on NPDES permit limit for effluent discharge, lb/day	MAIL	Maximum allowable industrial loading, lb/day
AHL _{REUSE}	AHL based on NPDES permit limit for effluent reuse, lb/day	PL	Pollutant loading, lb/day
AHL _{SEC}	AHL based on inhibition of secondary treatment processes, lb/day	Q _{DOM}	Domestic and commercial flow, mgd
AHL _{TER}	AHL based on inhibition of tertiary treatment processes, lb/day	Q _{HW}	Septic and hauled waste flow, mgd
AHL _{WQS}	AHL based on water quality standards, lb/day	Q _{IND}	Industrial flow, mgd
AIL _{IU}	Allowable industrial loading, lb/day	Q _{IU}	Flow from an industrial user, mgd
C _{DOM}	Domestic and commercial background levels, mg/L	Q _{NPDES}	NPDES permitted flow for effluent discharge, mgd
C _{HW}	Concentrations in septic/hauled waste, mg/L	Q _{REUSE}	NPDES permitted flow for effluent reuse, mgd
C _{INHIB2}	Inhibition criterion for secondary treatment, mg/L	Q _{STR}	Receiving stream (upstream) flow rate, mgd
C _{INHIB3}	Inhibition criterion for tertiary treatment, mg/L	Q _{AWTF}	AWTF average effluent flow rate, mgd
C _{LIM}	Uniform concentration-based local limit, mg/L	R _{PRIM}	Removal efficiency from headworks to primary effluent, decimal
C _{NPDES}	NPDES permit limit for effluent discharge, mg/L	R _{SEC}	Removal efficiency from headworks to secondary effluent, decimal
C _{REUSE}	NPDES permit limit for effluent reuse, mg/L	R _{AWTF}	Plant removal efficiency from headworks to effluent, decimal
C _{STR}	Receiving stream background concentration, mg/L	SGF	Safety and growth factor, decimal
C _{WQS}	In-stream state water quality standard, mg/L	WQS _{DISS}	WQS for the dissolved fraction, ug/L
CF	Conversion factor to convert dissolved to total metals fraction, unitless	WQS _{TOTAL}	WQS for the total recoverable fraction, ug/L
DC	AWTF design criteria, mg/L		
E _{AWTF}	AWTF effluent pollutant concentration, mg/L		
FOG	Fat, oil, and grease		
I _r	AWTF influent pollutant concentration at headworks, mg/L		
L _%	Percentage of MAHL currently utilized, percent		

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Executive Summary

DeKalb County contracted with Brown and Caldwell (BC) to conduct a Local Limits Evaluation (LLE) in accordance with Georgia Environmental Protection Division (EPD) and United States Environmental Protection Agency (EPA) requirements. The report provides guidance on the re-development of local limits on discharges to DeKalb County Department of Watershed Management's (DWM's) two advanced wastewater treatment facilities (AWTFs) namely Pole Bridge AWTF and Snapfinger AWTF, which receive industrial wastewater, as well as limits protective of the sewer system in DeKalb County.

Technically-based industrial local limits for pollutants of concern (POCs) were derived on the basis of the following:

- Protection of receiving stream water quality due to pass-through
- Prevention of treatment plant performance problems due to process interference or inhibition
- Prevention of hazardous sludge disposal.

A summary of DeKalb County DWM's modified industrial pretreatment local limits for the Pole Bridge and Snapfinger AWTFs is provided in Table E-1. The following sections provide a summary of the assumptions used to develop the local limits, important findings that were noted during the evaluation, and recommendations for future reviews and reevaluations.

Table E-1. Summary of Local Limits			
Local Limits Evaluation, DeKalb County DWM			
Pollutant	Proposed Local Limits (mg/L)		
	Discharges to Pole Bridge AWTF	Discharges to Snapfinger AWTF	All Discharges to DeKalb County Sewers ^a
Conventional Pollutants			
Ammonia (NH ₃ as N)	4,750	205	-----
Biochemical Oxygen Demand (BOD)	20,011	1,565	1,000
Chemical Oxygen Demand (COD)	-----	-----	2,000
Phosphorus, Total (as P)	768	44.5	-----
Suspended Solids, Total (TSS)	203,475	7,978	1,000
Inorganic Pollutants			
Arsenic	0.40	0.035	-----
Cadmium	0.005	0.005	-----
Chromium III	4.07	0.75	-----
Chromium VI	0.77	0.16	-----
Copper	6.56	0.017	-----
Cyanide	0.082	0.082	-----
Lead	0.53	0.081	-----
Mercury	0.002	0.002	-----

Table E-1. Summary of Local Limits			
Local Limits Evaluation, DeKalb County DWM			
Pollutant	Proposed Local Limits (mg/L)		
	Discharges to Pole Bridge AWTF	Discharges to Snapfinger AWTF	All Discharges to DeKalb County Sewers ^a
Molybdenum	3.60	0.34	-----
Nickel	2.56	0.11	-----
Selenium	0.34	0.025	-----
Silver	0.071	0.005	-----
Zinc	0.67	0.094	-----
Organic Pollutants			
Polychlorinated Biphenyls (PCBs) ^b	-----	0.0000358	-----
Other Parameters			
Oil and Grease	100	100	100
pH	-----	-----	Minimum of 6
Sulfate	-----	-----	50
Sulfide, Dissolved	-----	-----	1

^a These limits have been established specifically to protect the collection system against corrosion and apply to all industrial users in DeKalb County.

^b The calculated local limit for PCBs was less than the method detection limit; therefore, the local limit will be set at the lowest method detection limit for Aroclors.

Assumptions Used to Develop Local Limits

This LLE required several assumptions during the development process. The general assumptions that apply to both Pole Bridge and Snapfinger AWTFs are summarized below:

- All POCs for which local limits were developed were assumed to be conservative pollutants, meaning that they are not naturally biodegraded, chemically transformed, or volatilized within the AWTF. Conservative pollutants introduced to an AWTF ultimately exit the AWTF solely through effluent and sludge.
- Site-specific removal efficiencies were calculated for the conventional pollutants based on influent and effluent analytical results data from the period of January 2016 through December 2016. In addition, removal efficiencies were calculated for those non-conventional POCs detected in the influent and/or effluent samples during June 2015 and June 2016. For those POCs with no available site-specific removal efficiencies, literature values were used.
- DeKalb County domestic levels from the 1999 LLE were used as the domestic/commercial background concentrations, where available. When site-specific domestic/commercial concentrations of POCs in wastewater were not available, literature values were used. When DeKalb County domestic levels and/or literature background domestic/commercial levels exceeded the actual average influent pollutant concentrations at the AWTFs, the background domestic/commercial levels were assumed to equal the actual average influent pollutant concentrations. When domestic/commercial levels were not available, background levels were assumed negligible.

- Allowable headworks loadings were calculated based on the design criteria, National Pollutant Discharge Elimination System (NPDES) permit limits, activated sludge and nitrification treatment inhibition, sludge disposal standards, and acute and chronic water quality standards.
- NPDES permit limits for biochemical oxygen demand (BOD) and ammonia (as Nitrogen) are season-specific; therefore, the most stringent of the seasonal limits were used as a conservative measure. An NPDES permit limit exists for total residual chlorine. It was assumed that this parameter results from the chlorination process during treatment and therefore a local limit for industrial users is not necessary.
- Site-specific inhibition threshold levels were not available; therefore, all inhibition thresholds were based on literature values. Where the literature provided a range of inhibition threshold values, the minimum reported was used to provide a conservative limit.
- Sludge is land-applied at the County's dedicated land application system (LAS) and therefore must comply with the ceiling concentrations from Table 1, 40 CFR 503.13 and either the cumulative pollutant loading rates or the monthly average pollutant concentrations (also referred to as the "Clean Sludge" concentrations). The criteria used in calculations was the more stringent between the ceiling concentrations and monthly average pollutant concentrations.
- Georgia acute water quality standards are from 391-3-6-.03(5)(ii) and Georgia chronic water quality standards are from 391-3-6-.03(5)(i), 391-3-6-.03(5)(ii), 391-3-6-.03(5)(iii), and/or 391-3-6-.03(5)(iv). Standards that are hardness-dependent were first adjusted for hardness of the receiving stream and dissolved metals were then converted to total recoverable. The most stringent acute and chronic water quality standard for each parameter was used.

The following additional assumptions were used for the LLE for Pole Bridge AWTF:

- The average effluent flow of 7.5 million gallons per day (mgd) was based on self-monitoring report (SMR) data from January 2016 through December 2016. The average industrial flow of 0.104 mgd was based on the sum of reported industrial flows. The LLE used this industrial flow plus 50 percent to account for unknown and/or newly identified industrial flows, for a total industrial flow of 0.156 mgd. The average dry sludge to disposal of 25,917 pounds per day (lbs/day) was based on the SMR data from January 2016 through December 2016.
- EPD provided water quality data for monitoring station RV_04_839, South River at Georgia Highway 155 near Lithonia, which is located upstream of the discharge point. Concentrations from 1968 through 2012 were used. Detected concentrations were averaged to provide a background concentration per parameter. Non-detects were included as one half the detection limit. When a parameter was not detected in the South River, upstream concentration was assumed negligible.
- A safety factor of 20 percent was used to adequately address data uncertainties in this LLE. An additional growth factor of 10 percent was used to address future growth in this basin.

The following additional assumptions were used for the LLE for Snapfinger AWTF:

- The average influent flow of 27.57 mgd was based on SMR data from January 2016 through December 2016. The average industrial flow of 4.58 mgd was based on the sum of reported industrial flows. The LLE used this industrial flow plus 25 percent to account for unknown and/or newly identified industrial flows (5.729 mgd). The average dry sludge to disposal of 79,422 lbs/day was based on the SMR data from January 2016 through December 2016.
- EPD provided water quality data for monitoring station RV_04_836, South River at Flakes Mill Road, which is located upstream of the discharge point. Concentrations from 2015 were used. Detected concentrations were averaged to provide a background concentration per parameter. Non-detects were included as one half the detection limit. When a parameter was not detected in the South River, upstream concentration was assumed negligible.

- A safety factor of 20 percent was used to adequately address data uncertainties in the LLE, except for nickel, which will remain at 10 percent since the landfills are the primary dischargers of nickel and the County does not expect any increase in landfill discharge in the foreseeable future. No additional growth factor was used.

An additional set of local limits were developed specifically to protect the collection system in DeKalb County against corrosion. The following additional assumptions were used for the LLE for Sewer Protection:

- Corrosion potential in a wastewater collection system is primarily a function of the production and release of sulfur-containing compounds. Of these compounds, the most prevalent and important in odor and corrosion assessments is hydrogen sulfide (H₂S), which is extremely toxic and corrosive to metals and concrete. Sulfide production in sewers is the result of anaerobic (oxygen-deficient) conditions that develop in the solids and slime layers that form on submerged pipe and tank walls. If slime layer thickness increases, greater sulfide production results. Therefore, limiting levels of sulfate, dissolved sulfide, biochemical oxygen demand, chemical oxygen demand, total suspended solids, fats, oils, and grease, and pH will help control sulfide-generating mechanisms and minimize corrosion in the sewer collection system.
- Although AWTFs can effectively treat much higher concentrations of these specific POCs, municipalities have typically established these limits to protect the sewer upstream of the AWTF. For those POCs listed above for which AWTF-specific local limits were also calculated, the more stringent of the local limits will be enforced.

Important Findings of the LLE

The major findings of this LLE are as follows:

- The 1999 calculated local limits for Pole Bridge and Snapfinger AWTFs were based on the permitted flows of 20 and 36 mgd for the facilities, respectively. However, per EPA guidance, the average flow should be used in calculating local limits, which is currently 7.5 and 27.57 mgd, respectively. In addition, permitted industrial users are contributing less than the projected flows utilized in the 1999 LLE.
- New local limits based on water quality standards are in many cases significantly different from those calculated in 1999. The 1999 LLE did not adjust water quality standards based on the hardness of the receiving streams. For the current evaluation, stream hardness upstream of the Pole Bridge and Snapfinger AWTFs were provided by EPD; therefore, water quality standards were adjusted accordingly.
- In some cases, the total domestic/commercial loadings for a POC approached or exceeded the maximum allowable headworks loading (MAHL), resulting in a negative maximum allowable industrial loading (MAIL) and local limit. In these cases, little or no pollutant loading is available for industrial users. This situation may arise in part because some of the facilities considered "uncontrollable" are commercial facilities such as gas stations, radiator repair shops, car washes, or hospitals, which may discharge high levels of pollutants. DeKalb County will evaluate the sources it considers uncontrollable to determine whether select commercial facilities would be better classified as controlled sources with reducible pollutant loadings. In the case of negative MAILs, the domestic/commercial background concentrations were used as the industrial local limits.

Section 1

Introduction

The DeKalb County Department of Watershed Management (DWM) operates two advanced wastewater treatment facilities (AWTFs), Pole Bridge AWTF and Snapfinger AWTF, which serve DeKalb County. It is noted that wastewater from select areas in DeKalb County flow to Gwinnett County's Yellow River AWTF and City of Atlanta's RM Clayton AWTF, but this Local Limits Evaluation (LLE) does not address these facilities, other than providing overall sewer protective local limits. Industrial Pretreatment Programs for Gwinnett County and the City of Atlanta have completed their own local limits evaluations and DeKalb County incorporates their current limits into permits issued for industries that discharge to their treatment plants through DeKalb County sewers.

The DeKalb County DWM's current local limits for Pole Bridge and Snapfinger AWTFs are based on an evaluation completed in April 1999. Due to potentially significant changes in waste streams received at the AWTFs from industrial users as well as regulatory-driven changes in permits and water quality standards, pollutants of concern (POCs) and local limits were re-evaluated to meet regulatory requirements, help protect wastewater systems, personnel, and the environment, and help maintain sludge quality.

Pole Bridge and Snapfinger AWTFs were issued new National Pollutant Discharge Elimination System (NPDES) Permits by the Georgia Environmental Protection Division (EPD), effective March 1, 2017. In accordance with Part III.A.2.c., the current local limits must be reviewed to ensure that the local limits continue to prevent interference with the operation of the publicly owned treatment works (POTW), prevent pass-through of pollutants in violation of the NPDES permit, prevent municipal sludge contamination, and prevent toxicity to life in the receiving stream.

This LLE is a technical and detailed reevaluation of the local limits developed for Pole Bridge and Snapfinger AWTFs and sewer protection limits.

1.1 Project Objective

The objective of this effort was to develop industrial local limits for Pole Bridge and Snapfinger AWTFs to enforce the specific and general prohibitions as well as state and local regulations, address site-specific concerns, and provide sewer protection limits. The specific and general prohibitions along with categorical standards are designed to provide a minimum acceptable level of control over industrial user discharges. Local limits are established to provide additional control to prevent site-specific and environmental problems due to non-domestic discharges. Therefore, this LLE used site-specific data to identify POCs which may be expected to be discharged in quantities sufficient to cause plant or environmental problems. Some of the factors the AWTFs considered in developing local limits included:

- the efficiency of the AWTFs in treating wastes
- the history of compliance with NPDES permit limits
- the condition of the water body that receives treated effluent
- state and/or federal water quality standards (WQS) that are applicable to the water body receiving treated effluent
- the retention, use, and disposal of sewage sludge
- worker health and safety concerns
- sewer protection

This report provides documentation and reasoned guidance on the following:

- determining POCs for DeKalb County
- gathering and analyzing data
- calculating allowable headworks loadings (AHLs) for each POC based on applicable criteria.
- determining maximum allowable headworks loadings (MAHLs) and maximum allowable industrial loadings (MAILs) for each POC, and converting these loadings to local limits
- comparing current industrial loadings to MAILs to ensure that local limits meet the needs of the industries to the extent possible

1.2 Organization of Report

This LLE report has been organized into five sections. Section 1 is an introduction to the LLE and describes the project objectives. Section 2 describes how POCs were chosen for inclusion in the LLE and the general methodology followed through the LLE. Sections 3 and 4 provide details regarding the development of local limits for Pole Bridge and Snapfinger AWTFs, respectively. Section 5 provides local limits that were developed specifically to protect the sewers in DeKalb County. Section 6 lists the references.

A large volume of data and calculations was utilized to complete the LLE for DeKalb County DWM's Pole Bridge and Snapfinger AWTFs, including site-specific data, literature values, and calculation spreadsheets. The tables and appendices of this report contain the information needed to reproduce the local limits except for the raw analytical data, which are summarized in tables. Analytical data can be available upon request.

The following data and calculation spreadsheets can be found in the appendices to this report:

- **Appendix A** contains site-specific data for Pole Bridge AWTF used to develop the local limits. Included in this appendix are the following:
 - monthly influent and effluent flows from January 2016 through December 2016 (Table A1)
 - monthly volumes of sludge to disposal from January 2016 through December 2016 (Table A1)
 - concentrations of conventional pollutants in influent and effluent samples collected from January 2016 through December 2016 (Table A2)
 - concentrations of metals in influent and effluent samples collected from June 2015 and June 2016 (Table A3)
 - concentrations of organics in influent and effluent samples collected from June 2015 and June 2016 (Table A4)
 - removal efficiencies calculated for conventional pollutants, metals, and organics based on average influent and effluent concentrations (Tables A2 through A4)
 - upstream background concentrations of conventional and inorganic pollutants from the South River at Georgia Highway 155 near Lithonia (Table A5)
- **Appendix B** contains site-specific data for Snapfinger AWTF used to develop the local limits. Included in this appendix are the following:
 - monthly influent and effluent flow from January 2016 through December 2016 (Table B1)
 - monthly volumes of sludge to disposal from January 2016 through December 2016 (Table B1)
 - concentrations of conventional pollutants in influent and effluent samples collected from January 2016 through December 2016 (Table B2)
 - concentrations of metals in influent and effluent samples collected from January 2016 through December 2016 (Table B3)

- concentrations of organics in influent and effluent samples collected from June 2016 (Table B4)
- removal efficiencies calculated for conventional pollutants, metals and organics based on average influent and effluent concentrations (Tables B2 through B4)
- upstream background concentrations of conventional pollutants from the South River at Flakes Mill Road (Table B5)
- **Appendix C** contains the literature data utilized in the LLE when site-specific data were not available. Included in this appendix are the following:
 - removal efficiencies for priority pollutants, including overall treatment plant removal efficiencies as well as removal efficiencies through primary, secondary, and tertiary treatment processes (Tables C1 through C4)
 - treatment inhibition threshold levels for activated sludge and nitrification treatment (Tables C5 and C6)
 - domestic and commercial pollutant loadings (Table C7)
- **Appendix D** contains the regulatory limits and/or criteria applicable to Pole Bridge and Snapfinger AWTFs, including the following:
 - design-based wastewater treatment plant capacity criteria (Table D1)
 - NPDES permit limits (Table D2)
 - biosolids land application regulatory limits (Table D3)
 - water quality standards for Pole Bridge AWTF (Tables D4 and D5) and for Snapfinger AWTF (Tables D6 and D7)
 - worker protection screening levels based on fume toxicity and explosivity (Tables D8 and D9)
- **Appendix E** contains the calculation worksheets used to calculate all allowable headworks loadings, allowable industrial loadings, and local limits for Pole Bridge AWTF, including the following:
 - allowable headworks and industrial loadings based on design criteria, NPDES permit, activated sludge and nitrification inhibition threshold levels, sludge disposal and acute and chronic water quality standards (Tables E1 through E8)
 - summary of allowable headworks and industrial loadings (Tables E9 and E10)
 - maximum allowable headworks loadings and local limits (Table E11).
- **Appendix F** contains the calculation worksheets used to calculate all allowable headworks loadings, allowable industrial loadings, and local limits for Snapfinger AWTF, including the following:
 - allowable headworks and industrial loadings based on design criteria, NPDES permit, activated sludge and nitrification inhibition threshold levels, sludge disposal and acute and chronic water quality standards (Tables F1 through F8)
 - summary of allowable headworks and industrial loadings (Tables F9 and F10)
 - maximum allowable headworks loadings and local limits (Table F11)

Section 2

Pollutants of Concern: Screening and General Methodologies

This section describes how POCs were chosen for inclusion in the LLE and the general methodology followed through the evaluation.

2.1 Screening for Pollutants of Concern

A POC is any pollutant that may be expected to be discharged to an AWTF in sufficient amounts to cause pass-through or interference, cause problems in its collection system, or present risk to workers. Pollutants that are contributing to or known to cause operational problems (i.e., inhibition of a treatment process) are also considered POCs even if the pollutants are not currently causing permit violations. The United States Environmental Protection Agency (EPA) has identified 15 pollutants often found in AWTF sludge and effluent that it considers potential POCs. These include arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, silver, zinc, molybdenum, selenium, 5-day biochemical oxygen demand (BOD), total suspended solids (TSS) and ammonia, as nitrogen (for plants that accept non-domestic sources of ammonia). Additional POCs listed in Table 2-1 were identified using applicable EPA screening criteria contained in the *EPA Local Limits Guidance Manual* (EPA, 2004):

- **NPDES Permit Limits.** These permit conditions establish the objectives that the AWTF must meet to prevent pass-through and interferences. The AWTF is required to prohibit discharge from industrial users in amounts that result in or cause a violation of any requirement of the AWTF's NPDES permit.
- **Water Quality Criteria.** Water quality criteria have been developed by EPA and/or EPD for the protection of surface water, including the receiving waters for permitted dischargers. The AWTF does not have to develop a local limit for every pollutant for which there is a water quality standard or criterion. However, EPA recommends that any pollutant that has a reasonable potential to be discharged in amounts that could exceed WQS or criteria should be considered a POC and evaluated accordingly.
- **Sludge Quality Standards.** AWTFs must prohibit industrial user discharges in amounts that cause a violation of applicable sludge disposal regulations, or that restrict the AWTF's use of its chosen sludge disposal option. Sludge that is land-applied at the County's dedicated land application system (LAS) must comply with the ceiling concentrations from Table 1, 40 CFR 503.13 and either the cumulative pollutant loading rates or the monthly average pollutant concentrations (also referred to as the "Clean Sludge" concentrations). The criteria used in calculations was the more stringent between the ceiling concentrations and monthly average pollutant concentrations.
- **Prohibition on Treatment Plant Interference.** The General Pretreatment Regulations prohibit any user of an AWTF from discharging pollutants that cause interference (i.e., a discharge that inhibits or disrupts an AWTF resulting in a violation of the AWTF's NPDES permit or non-compliance with the AWTF's sewage sludge requirements). EPA recommends that the AWTF consider pollutants that have previously interfered with or may potentially interfere with the treatment work's operation to be a potential POC.
- **Influent, Effluent, and Sludge Scans at the AWTF.** EPA recommends that the AWTF conduct additional screening for any pollutant found in the priority pollutant scans of its influent, effluent or sludge to determine whether the pollutant should be listed as a POC. Although a pollutant found in this way is a

potential POC, the AWTF may determine based on the pollutant's concentration that the pollutant need not be selected as a POC for which local limits are developed.

- **Industrial Discharge Scans.** An additional screening was conducted to identify pollutants detected in the industrial users' discharge. Although a pollutant found in this way is a potential POC, the AWTF may determine, based on the pollutant's concentration, that the pollutant need not be selected as a POC for which local limits are developed.

In general, EPA recommends that an LLE be conducted for EPA's 15 POCs, as well as any pollutant for which the AWTF has a preexisting local limit, an applicable NPDES limit or sludge disposal limit, or has caused inhibition or other problems in the past.

2.1.1 Pollutants of Concern

Table 2-1 provides the parameters and criteria used for this screening, and identifies those pollutants for which local limits are needed based on the screening for Pole Bridge and Snapfinger AWTFs.

In addition to EPA's 15 POCs, 19 additional parameters were identified as POCs for both Pole Bridge AWTF and Snapfinger AWTF. At the request of the DeKalb County DWM, oil and grease and polychlorinated biphenyls (PCBs) were also included in the evaluation. Additionally, BOD, chemical oxygen demand (COD), TSS, pH, sulfate and dissolved sulfide were included in the evaluation for the protection of the sewers.

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA POC?	Is the parameter detected in influent/effluent/sludge scans?	Is the parameter detected/reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
Conventional Pollutants										
Ammonia	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	YES
Biochemical Oxygen Demand (BOD)	Yes	Yes	Yes	Yes	Yes	No	No	No	No	YES
Chemical Oxygen Demand (COD)	No	Yes	Yes	No	No	No	No	No	No	No
Phosphorus, Total (as P)	No	Yes	Yes	Yes	Yes	No	No	No	No	YES
Suspended Solids, Total (TSS)	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	YES
Inorganic Pollutants										
Antimony	No	No	Yes	No	No	Yes	No	No	No	YES
Arsenic	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	YES
Barium	No	No	Yes	No	No	No	No	No	No	No
Cadmium	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	YES
Chromium III	No	No	Yes	No	No	Yes	Yes	No	No	YES
Chromium VI	No	No	Yes	No	No	Yes	Yes	No	No	YES
Chromium, Total	Yes	Yes	Yes	No	Yes	No	Yes	No	No	YES
Copper	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	YES
Cyanide	Yes	No	Yes	No	Yes	Yes	Yes	No	No	YES
Lead	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	YES
Mercury	Yes	No	No	No	Yes	Yes	Yes	No	Yes	YES
Molybdenum	Yes	No	No	No	No	No	No	No	Yes	YES
Nickel	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	YES
Selenium	Yes	No	Yes	No	Yes	Yes	No	No	Yes	YES
Silver	Yes	No	Yes	No	Yes	Yes	Yes	No	No	YES
Thallium	No	No	No	No	No	Yes	No	No	No	No
Vanadium	No	No	Yes	No	No	No	No	No	No	No

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA POC?	Is the parameter detected in influent/effluent/sludge scans?	Is the parameter detected/reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes
Organic Pollutants										
Zinc										
Acenaphthene	No	No	No	No	No	Yes	No	No	No	No
Acetone	No	No	Yes	No	No	No	No	No	No	No
Acrolein	No	No	No	No	No	Yes	No	Yes	No	No
Acrylonitrile	No	No	No	No	No	Yes	No	Yes	No	No
Aldrin	No	No	No	No	No	Yes	No	No	No	No
Anthracene	No	No	No	No	No	Yes	Yes	No	No	No
Aroclor 1232	No	No	Yes	No	No	Yes	No	No	No	Yes
Aroclor 1242	No	No	No	No	No	Yes	No	Yes	No	No
Aroclor 1254	No	No	No	No	No	Yes	No	Yes	No	No
Benzene	No	No	Yes	No	No	Yes	Yes	Yes	No	Yes
Benzidine	No	No	No	Report Only	No	Yes	No	No	No	No
Benzo(a)Anthracene	No	No	No	No	No	Yes	No	No	No	No
Benzo(a)Pyrene	No	No	No	No	No	Yes	No	No	No	No
Benzo(k)Fluoranthene	No	No	No	No	No	Yes	No	No	No	No
Benzofluoranthene, 3,4-	No	No	No	No	No	Yes	No	No	No	No
BHC-Alpha, beta	No	No	Yes	No	No	Yes	No	No	No	Yes
BHC-Beta, delta	No	No	No	No	No	Yes	No	No	No	No
BHC-Delta, delta'	No	No	No	No	No	No	No	No	No	No
Bis(2-chloroethyl)Ether	No	No	No	No	No	Yes	No	No	No	No
Bis(2-chloroisopropyl)Ether	No	No	No	No	No	Yes	No	No	No	No
Bis(2-chloromethyl)Ether	No	No	No	No	No	Yes	No	No	No	No
Bis(2-chloromethyl)Phthalate	No	No	No	No	No	No	No	Yes	No	No
Bis(2-ethylhexyl)Phthalate	No	No	Yes	Report Only	No	Yes	No	No	No	Yes

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA POC?	Is the parameter detected in influent/effluent/sludge scans?	Is the parameter detected/reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
Bromodichloromethane	No	No	Yes	No	No	No	No	No	No	No
Bromoform	No	No	No	No	No	Yes	No	Yes	No	No
Butylbenzyl Phthalate	No	No	No	No	No	Yes	No	No	No	No
Carbon Disulfide	No	No	No	No	No	No	No	Yes	No	No
Carbon Tetrachloride	No	No	No	No	No	Yes	No	Yes	No	No
Chlordane	No	No	No	No	No	Yes	No	Yes	No	No
Chlordane, Gamma	No	No	No	No	No	No	No	No	No	No
Chlorobenzene	No	No	No	No	No	Yes	No	Yes	No	No
Chlorodibromomethane	No	No	No	No	No	Yes	No	No	No	No
Chloroethane	No	No	No	No	No	No	No	Yes	No	No
Chloroform	No	Yes	Yes	No	No	Yes	No	Yes	No	Yes
Chloronaphthalene, 2-	No	No	No	No	No	Yes	No	No	No	No
Chlorophenol, 2-	No	No	No	No	No	Yes	Yes	No	No	No
Chrysene	No	No	No	No	No	Yes	No	No	No	No
DDD, 4,4'-	No	No	No	No	No	Yes	No	No	No	No
DDE, 4,4'-	No	No	No	No	No	Yes	No	No	No	No
DDT, 4,4'-	No	No	No	No	No	Yes	No	No	No	No
Dibenzo(a,h)Anthracene	No	No	No	No	No	Yes	No	No	No	No
Dibromochloromethane	No	No	No	No	No	No	No	No	No	No
Dichlorobenzene, 1,2-	No	No	No	No	No	Yes	Yes	Yes	No	No
Dichlorobenzene, 1,3-	No	No	No	No	No	Yes	Yes	No	No	No
Dichlorobenzene, 1,4-	No	Yes	No	No	No	Yes	Yes	Yes	No	Yes
Dichlorobenzidine, 3,3'-	No	No	No	No	No	No	No	No	No	No
Dichlorobromomethane	No	No	No	No	No	Yes	No	No	No	No

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA POC?	Is the parameter detected in influent/ effluent/ sludge scans?	Is the parameter detected/ reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
Dichlorodifluoromethane	No	No	No	No	No	No	No	Yes	No	No
Dichlorofluoromethane	No	No	No	No	No	No	No	No	No	No
Dichloroethane, 1,1-	No	No	No	No	No	No	No	Yes	No	No
Dichloroethane, 1,2-	No	No	Yes	No	No	Yes	No	Yes	No	YES
Dichloroethylene, 1,1-	No	No	No	No	No	Yes	No	Yes	No	No
Dichloroethylene, cis-1,2-	No	No	Yes	No	No	No	No	No	No	No
Dichloroethylene, trans-1,2-	No	No	No	No	No	Yes	No	No	No	No
Dichlorophenol, 2,4-	No	No	No	No	No	Yes	Yes	No	No	No
Dichloropropane, 1,2-	No	No	No	No	No	Yes	No	Yes	No	No
Dichloropropylene, 1,3-	No	No	No	No	No	No	No	Yes	No	No
Dieldrin	No	No	No	No	No	Yes	No	Yes	No	No
Diethyl phthalate	No	No	Yes	No	No	Yes	No	Yes	No	YES
Dimethyl phthalate	No	No	No	No	No	Yes	No	No	No	No
Dimethylphenol, 2,4-	No	No	Yes	No	No	Yes	Yes	No	No	YES
Di-n-butyl phthalate	No	No	No	No	No	Yes	No	No	No	No
Dinitro-o-cresol, 4,6-	No	No	No	No	No	No	No	Yes	No	No
Dinitrophenol, 2,4-	No	No	No	No	No	Yes	Yes	No	No	No
Dinitrophenol, 2-Methyl-4,6-	No	No	No	No	No	Yes	No	No	No	No
Dinitrotoluene, 2,4-	No	No	No	No	No	Yes	Yes	Yes	No	No
Diphenylhydrazine, 1,2-	No	No	No	No	No	Yes	Yes	No	No	No
Endosulfan Sulfate	No	No	No	No	No	No	No	No	No	No
Endosulfan, alpha-	No	No	Yes	No	No	Yes	No	No	No	YES
Endosulfan, beta-	No	No	No	No	No	Yes	No	No	No	No
Endrin	No	No	No	No	No	Yes	No	Yes	No	No

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA PDC?	Is the parameter detected in influent/effluent/sludge scans?	Is the parameter detected/reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
Endrin Aldehyde	No	No	No	No	No	Yes	No	No	No	No
Ethylbenzene	No	No	Yes	No	No	Yes	Yes	Yes	No	Yes
Fluoranthene	No	No	No	No	No	Yes	No	No	No	No
Fluorene	No	No	No	No	No	Yes	No	No	No	No
Formaldehyde	No	No	No	No	No	No	No	Yes	No	No
Heptachlor	No	No	No	No	No	Yes	No	Yes	No	No
Heptachlor Epoxide	No	No	No	No	No	Yes	No	No	No	No
Hexachlorobenzene	No	No	No	No	No	Yes	No	No	No	No
Hexachlorobutadiene	No	No	No	No	No	Yes	Yes	No	No	No
Hexachlorocyclopentadiene	No	No	No	No	No	Yes	No	Yes	No	No
Hexachloroethane	No	No	No	No	No	Yes	No	Yes	No	No
Indeno(1,2,3-cd)Pyrene	No	No	No	No	No	Yes	No	Yes	No	No
Isophorone	No	No	No	No	No	Yes	No	No	No	No
Isopropyltoluene, p-	No	No	No	No	No	No	No	No	No	No
Lindene	No	No	Yes	No	No	Yes	No	No	No	Yes
Methyl Bromide (Bromomethane)	No	No	No	No	No	Yes	No	Yes	No	No
Methyl Chloride (Chloromethane)	No	No	No	No	No	Yes	No	Yes	No	No
Methyl ethyl ketone (2-Butanone)	No	No	No	No	No	No	No	Yes	No	No
Methyl tert-butyl ether	No	No	Yes	No	No	No	No	No	No	No
Methylene blue active substances (MBAS)	No	No	No	No	No	Yes	No	No	No	No
Methylene chloride	No	No	Yes	No	No	Yes	No	Yes	No	Yes
Methoxychlor	No	No	No	No	No	Yes	No	No	No	No
Naphthalene	No	No	Yes	No	No	No	Yes	Yes	No	Yes
Nitrobenzene	No	No	No	No	No	Yes	Yes	Yes	No	No

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA POC?	Is the parameter detected in influent/effluent/sludge scums?	Is the parameter detected/reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
N-Nitrosodimethylamine	No	No	No	No	No	Yes	No	No	No	No
N-Nitrosodiphenylamine	No	No	No	No	No	Yes	No	No	No	No
Nonylphenol	No	No	No	No	No	Yes	No	No	No	No
PCBs	No	No	No	No	No	Yes	No	No	No	No
Pentachlorophenol	No	No	No	No	No	Yes	Yes	Yes	No	No
Phthalate, Di-n-octyl	No	No	Yes	No	No	No	No	No	No	No
Phenanthrene	No	No	No	No	No	Yes	Yes	No	No	No
Phenol	No	No	Yes	No	Yes	Yes	Yes	Yes	No	YES
Phenolics, Total Recoverable	No	No	No	No	No	No	No	No	No	No
Pyrene	No	No	No	No	No	Yes	No	No	No	No
Silvex (2,4,5-TP)	No	No	No	No	No	Yes	No	No	No	No
Tetrachloroethane, 1,1,2,2-	No	No	No	No	No	Yes	No	Yes	No	No
Tetrachloroethylene	No	No	Yes	No	No	Yes	No	Yes	No	YES
Toluene	No	Yes	Yes	No	No	Yes	Yes	Yes	No	YES
Toxaphene	No	No	No	No	No	Yes	No	Yes	No	No
Trichlorobenzene, 1,2,4-	No	No	No	No	No	Yes	No	Yes	No	No
Trichloroethane, 1,1,1-	No	No	No	No	No	No	No	Yes	No	No
Trichloroethane, 1,1,2-	No	No	No	No	No	Yes	No	Yes	No	No
Trichloroethylene	No	No	Yes	No	No	Yes	No	Yes	No	YES
Trichlorofluoromethane	No	No	No	No	No	No	No	Yes	No	No
Trichlorophenol, 2,4,6-	No	No	No	No	No	Yes	Yes	Yes	No	No
Vinyl Chloride	No	No	No	No	No	Yes	No	Yes	No	No
Xylenes, Total	No	No	Yes	No	No	No	No	No	No	No

Table 2-1. Pollutants of Concern Screening Local Limits Evaluation, DeKalb County DWM

Parameter	Is the parameter a USEPA POC?	Is the parameter detected in influent/effluent/sludge scans?	Is the parameter detected/reported in industrial effluent?	Is there an existing NPDES permit for the parameter?	Is there an existing local limit for the parameter?	Is there an applicable WQS for the parameter?	Are inhibition threshold values reported (default) for the parameter?	Are there worker protection screening values for the parameter?	Is there an applicable sludge disposal criterion for the parameter?	Is there a need for a local limit based on screening?
Other Pollutants										
Oil & Grease	No	Yes	Yes	No	Yes	Yes	No	No	No	Yes
Total Dissolved Residue (TDR)	No	No	Yes	No	No	No	No	No	No	No
Total Dissolved Solids (TDS)	No	No	Yes	No	No	No	No	No	No	No
Total Petroleum Hydrocarbons (TPH)	No	No	Yes	No	No	No	No	No	No	No
Total Toxic Organics (TTO)	No	No	Yes	No	No	No	No	No	No	No
Sulfide	No	No	No	No	No	No	Yes	No	No	No
Iodine	No	No	No	No	No	No	Yes	No	No	No
Surfactants	No	No	No	No	No	No	Yes	No	No	No
Sodium	No	No	No	No	No	No	No	No	No	No
Chloride	No	No	No	No	No	No	Yes	No	No	No
Hydrogen sulfide	No	No	No	No	No	No	No	Yes	No	No
Total Residual Chlorine (TRC)	No	No	No	Yes	No	No	No	No	No	No
Ortho-Phosphorus	No	No	No	Report Only	No	No	No	No	No	No
Organic Nitrogen	No	Yes	No	Report Only	No	No	No	No	No	No
Nitrate-Nitrite as N	No	Yes	No	Report Only	No	No	No	No	No	No
Kjeldahl Nitrogen, Total (TKN)	No	Yes	No	Report Only	No	No	No	No	No	No

* United States Environmental Protection Agency (USEPA) Pollutant of Concern (POC).

• National Pollutant Discharge Elimination System

• Water Quality Standards

NA = No samples analyzed for this parameter